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**October 6, 2023**

**Via ECF**

Hon. John G. Koeltl, USDJ  
United States District Court, SDNY  
500 Pearl Street, Courtroom: 12B  
New York, NY 10007-1312  
Tel: 212-805-0222

APPLICATION GRANTED  
SO ORDERED

  
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John G. Koeltl, U.S.D.J.  
10/9/23

**Re: Ramirez v. Rector Street Food Enterprises LTD.**  
**Case No. 22-CV-08193 (JGK)(JW)**  
**Status Report/Motion for Extension of Time**

Dear Judge Koeltl:

My firm represents plaintiff in the above-referenced action, and I respectfully write to provide the Court with a status report as per Your Honor's May 8, 2023, order. Since the request for a two-week extension was granted, I have spoken with new defense counsel who apparently needs some additional time to obtain the files for prior counsel, and his client and to catch up on the proceedings. Additionally, the mediator has also reengaged both sides in the last day or so. Therefore, it is respectfully requested that the Court grant another two-week extension of the October 6, 2023, deadline for the parties to file a status report/proposed discovery plan. One prior request for an extension of this deadline was made and granted.

I thank the Court in advance for its time and consideration.

Respectfully submitted,

Abdul Hassan Law Group, PLLC

/s/ Abdul Hassan  
By: Abdul K. Hassan, Esq. (AH6510)  
*Counsel for Plaintiff*

**cc: Defense Counsel via ECF**